



27 May 2003

Bill Pennington
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California Energy Commission
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sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Exception to Section 149(b) 1.B

Dear Mr. Pennington:

Comment

The exception for “rock roofs,” both as written and in the proposed new draft sent by Virginia Lew on 20 May, should be deleted.

Rationale

First, I must admit that I don’t have a copy of the Building Code in front of me. However, I assume that “reroofing overlay . . . where only the rock or gravel surface is removed” refers to adding layers of felts – generally bad practice, although permitted by code -- while “replacement” really means “removal and replacement.” If the latter was intended, perhaps a change in the wording is in order.

More substantively, however, I do not understand the need for a special exemption for rock covered roofs. Unlike the early drafts of the Chicago ordinance, Title 24 is not requiring the immediate replacement of the majority of the roofing stock in the state.

Rock-covered roof systems can provide substantial benefits to a building owner, ranging from fire resistance to physical security. (I believe that the San Diego USD requires gravel surfacing for student safety.) However, assuming that the proposed Section 118 (i) is deleted, owners who prefer or require a rock surface will have alternate methods of compliance available to them which will achieve all of the energy saving goals of the CEC.

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer
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